

**REMARKS**

The above amendment with the following remarks is submitted to be fully responsive to the Office Action of September 10, 2004. Reconsideration of this application in light of the amendment and the allowance of this application are respectfully requested.

Claims 1-17 were pending in the present application prior to the above amendment. In response to the Office Action, claims 1-3, 7-9, 14 and 16 have been amended and claim 10 has been canceled. Therefore, claims 1-9 and 11-17 are still pending in the present application and are believed to be in proper condition for allowance.

The present invention recited in independent claim 1 is directed to a data structure suitable for use in collecting, distributing or storing product data for use in a catalog. The data structure is based on a data model having one or more classes, wherein each of the classes has one or more associated categories. More specifically, the data structure includes at least one class definition arranged to identify one or more associated categories, a plurality of category definitions, each being arranged to identify an associated attribute group, and a plurality of attribute group definitions, each attribute group definition being arranged to identify one or more attributes that are associated with the attribute group. In addition, the data structure of the present invention further includes a plurality of possible value lists, each possible value list being arranged to identify a plurality of values that are selectable as a value for an attribute of a product being classified, each attribute being associated with at least one of the plurality of possible value lists.

Thus, the data structure in accordance with the present invention also includes plurality of possible value lists. As described in the Specification, each of the possible value lists identify a plurality of values that may be selected as a value for an attribute of a product being classified. For example, as described in the Specification, a possible value list associated with the attribute of "Clock Speed" of a desktop computer may set forth values of 100, 200, 300, etc. (See Page 17, lines 1 to 14).

What this means is that for a desktop computer, the attribute of clock speed for the particular product being classified in accordance with the data model can be selected from the values set forth. In another computer example, for the attribute of "RAM Size", an associated possible value list may set forth values 16, 32, 64, 128, 256, 512, 1024, 1, 2, 3, etc. that correspond to common values used to described the amount of random access memory a computer may have. Thus, the possible value list allows the appropriate value for the RAM to be selected for a particular product that is being classified in accordance with the data model.

The dependent claims 2-7 recite additional features to that noted above. For example, claim 2 recites a plurality of possible unit lists that identify units which are selectable as a unit for an attribute of the product being classified. Thus, in the above provided example of the attribute of "Clock Speed", the possible unit list may set forth the units of Hz, KHz, MHz, GHz, etc. that correspond to common units used in describing the clock speed. Likewise, in the example of the attribute of "RAM Size" for desktop computers, the possible unit list may set forth the units of bytes, Kb, Mb and Gb that correspond to the common units used in describing the size of the random access memory in a computer.

In accordance with another aspect of the present invention, independent claim 8 recites a data structure including a plurality of system SKUs, each system SKU being arranged to identify one of the plurality of products and a plurality of manufacturer SKUs, each manufacturer SKU being associated with one of the plurality of system SKUs. The data structure also includes an attribute table in which selected attributes for each of the products are stored. Each of the selected attributes are identified by the system SKU corresponding to the product classified according to the data structure, and have at least one of the values from the associated possible value list. Moreover, the data structure further includes a customer mapping table that maps each system SKU to a customer SKU assigned to the corresponding product by a particular customer to which product data associated with the product is to be provided.

Correspondingly, independent claim 8 requires the data structure to have an attribute table in which selected attributes for each of the products are stored, and be

implemented so that each of the attributes identified by the system SKU have at least one of the values from the associated possible value list. In addition, the data structure includes a customer mapping table to map between the system SKU to the customer SKU. Dependent claim 9 further requires some of the attributes in the attribute table to have units in the associated possible unit list.

Referring now to the Office Action, claims 1-17 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,740,425 to Povilus in view of U.S. application No. 2002/0040352A1 to McCormick. The Applicants respectfully disagree and request reconsideration and the withdrawal of this rejection for the reasons set forth below.

Povilus is directed a data structure and method for single and multi-manufacturer catalogs using a single database. The Examiner again asserts that Povilus teaches a plurality of attribute group definitions that have an associated possible value list. (Citing Col. 14, lines 57-67). However, in contrast to the Examiner's assertion and as noted in the response to the prior Office Action, the cited portion of Povilus, or for that matter, any portion of Povilus, fails to disclose any lists that set forth possible values, or such lists where the values are selectable as claimed in the present invention. The cited portion of Povilus describes different classes or groupings of products having differing attributes, and also describes that genus inherits the behaviors of the source. However, the cited portion does not describe a possible value list that is associated with an attribute as claimed in the present invention. No lists are described at all and the Applicants request clarification as to where the "possible value lists" are disclosed in the portion of Povilus that is being relied upon by the Examiner.

In addition, as conceded by the Examiner in the Office Action, Povilus does not teach a plurality of value lists, each of the possible value list identifying a plurality of values that may be selected as a value for the attribute. To correct the deficiencies of Povilus, the Examiner relies upon the McCormick reference. However, it is respectfully noted that the present application was filed on June 26, 2000 and claims

priority to the provisional application filed on September 2, 1999, whereas McCormick was filed on June 29, 2001. Therefore, McCormick is not a prior art reference.

Even if McCormick is considered proper prior art, the relevancy of McCormick is not at all clear since it is directed to an electronic commerce network that facilitates exchange of goods and services, and the portion cited by the Examiner (Para. 51) merely states a "Marketing & Customer Management Application" that supports customer referral management, customer management and marketing and incentive plan management. As to how the Examiner interpreted this portion of McCormick to disclose a plurality of values that may be selected for an attribute is unclear, and the Applicants request clarification thereof.

In the above regard, although the Examiner has not established any teachings or motivations to combine the system and method described in Povilus with McCormick in the manner suggested, even if the references are combined, such combination would still fail to result in the data structure claimed in the pending claims. More specifically, as noted, neither of the references relied upon by the Examiner disclose, teach, or otherwise suggest a data structure that includes a plurality of value lists, each of the possible value list identifying a plurality of values that may be selected as a value for the attribute.

The Examiner is respectfully reminded that reminded that "to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference must teach or suggest all the claim limitations. The teachings or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure." MPEP §§ 2142 and 2143 (citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)) (see also MPEP § 706.02(j)).

The above remarks are believed to equally apply to the Examiner's rejection of the remaining claims. As briefly noted, above, dependent claims 2-7, 9, and 11-17 are

directed to various features of the present invention which are also not disclosed, taught, or otherwise suggested in the prior art. For example, the cited references do not teach or suggest a data structure further including a plurality of possible unit lists described above where the possible unit lists identify units for the attribute that may be selected. Therefore, in view of the above, the Applicants request the reconsideration and withdrawal of this rejection, and the allowance of the pending claims 1-9, and 11-17, claim 10 having been previously canceled.

However, in view of the fact that the present invention as defined in the pending claims does not appear to be properly understood, independent claims 1 and 8 have been amended to more clearly define the scope of patent protection to which the Applicants are entitled. In addition, dependent claims 2, 3, 7, 9, and 14 have also been amended to better correspond to the amended independent claims.

In view of the foregoing, it is submitted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if the Examiner deems that any issue remains after considering this response, he is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Respectfully submitted,



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